

**United States District Court
Civil Action Case Number: 05 10502 JLT**

**John D. Mooney,
Plaintiff**

v.

**Defendant's Answer to
Complaint and Jury Demand**

**Deborah A. Mooney,
Defendant**

I, the Defendant, Deborah A. Mooney, answers the Plaintiff's Complaint in the above-mentioned matter as follows:

- 1. INTRODUCTION - The Defendant disagrees with the Plaintiff's reasons for seeking relief.**
- 2. JURISDICTION - The Defendant cannot agree or disagree.**
- 3. FACTS - The Defendant admits or agrees with the following as so numbered:**
1,2,4,5,9,10,11,12,13,14,16,35,37,44, and 45
- 4. FACTS - The Defendant denies or disagrees with the following as so numbered:**
19,20,21,24,25,26,27,30,40,41,42,46,47,48,50,51,52,53, 54,55,56, and 57

5. **FACTS** - The Defendant cannot admit/agree nor deny/disagree with the following as so numbered:

3,8,15,17,18,28,29,36,38,39, and 43

7. **FACTS** - The Defendant doesn't know and therefore cannot admit/agree nor deny/disagree with the following as so numbered:

6,7,22,23,31,32,33,34, and 49

8. **JURY DEMAND** - The Defendant disagrees on the necessity of a jury trial.

I, the Defendant, Deborah A. Mooney, have answered truthfully and honestly to the best of my ability, the Plaintiff's complaint. The Plaintiff's complaint is one containing false allegations, mis-representations and half-truths about myself and false testimony and half-truths about himself. It is my belief that the Plaintiff is disgruntled because I did not meet his demands in regard to the recent (June 30, 2004) sale of our former marital home. I believe he has made his complaint due to disappointment over the proceeds (dollar amount) he received from the sale of our former marital home.

Wherefore, I, the Defendant, Deborah A. Mooney, humbly request that this Honorable Court dismiss the Complaint and award the Defendant reasonable relief for fees and costs related to my defense of the Complaint and further relief as this Court deems necessary and proper.

Defendant,

Deborah A. Mooney
Deborah A. Mooney